



Q1.

Introduction

The Nursing and Midwifery Board of Australia (NMBA) and Australian Health Practitioner Regulation Agency (Ahpra) are consulting on the proposed **Guidelines for privately practising nurses**. We welcome feedback from organisations, registered health practitioners and the public.

The questions in this consultation relate to the proposed proposed ***Guidelines for privately practising nurses***.

Please read the [public consultation paper](#) before responding. All questions are optional, and you are welcome to respond to any you find relevant, or that you have a view on. It will take approximately 15 minutes to complete this survey if you answer all questions. (upon completion of the survey there is an option to save a copy of your responses for your records) The consultation is open for 6 weeks. The submission deadline is close of business **12 April 2024**.

How do we use the information you provide?

The consultation is voluntary. All data collected will be treated confidentially and anonymously. Data collected will only be used for the purposes described above. We may publish data from this consultation in internal documentation and any published reports. When we do this, we ensure that any personal or identifiable information is removed. We do not share your personal information associated with our consultations with any party outside of Ahpra except as required by law. The information you provide will be handled in accordance with [Ahpra's Privacy Policy](#).

Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published. We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details. We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include published experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982 (Cth)*, which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or

part of it as confidential. **Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

If you have any questions, please contact the [Nursing and Midwifery Board of Australia](#).

Please click on the ARROW below to start the survey.

The NMBA and Ahpra acknowledge the Traditional Owners of Country throughout Australia and their continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and Elders past and present.

Q46. Are you completing this submission on behalf of an organisation or as an individual?

- ☒ Organisation
- ☐ Individual

Q47. Your details

Name

Sabrina Fukuda

Organisation

Council of Deans of Nursing and Midwifery (Australia and New Zealand)

Email

Q49. **Publication of your submission**

Q48. Do you give permission for your submission to be published?

- ☒ Yes - publish my submission **with** my name / organisation name
- ☐ Yes - publish my submission **without** my name
- ☐ Yes - publish my submission **without** my organisation name
- ☐ Yes - publish my submission **without** both my name and organisation name
- ☐ No - **do not** publish my submission

Q34. **Guidelines for privately practising nurses**

Q32. 1. Is the content of the proposed revised guidelines helpful, clear and relevant?

- ☒ Yes
- ☐ No

Q33. Please explain why

This question was not displayed to the respondent.

Q35. Guidelines for privately practising nurses

Q36. 2. Is there any content that needs to be changed, removed or added in the proposed guidelines?

☒ Yes

☐ No

Q37. Please provide details

Overall, the guidance provides clear and relevant information. It is suggested that there needs to be a bit more clarity regarding nurses in private practice in non-clinical settings e.g. management consultancy. The document largely seems to be referencing the provision of clinical care/services, yet the definition of 'health service' includes point 'h' services provided by a registered health practitioner as per the National Law. There is some potential for this to be a little confusing if not providing what many would see as a 'health service' when doing work in a private capacity such as management consultancies in a health setting. It is suggested the majority of practitioners reading the document will see this as applying to the delivery of health care services i.e. largely clinical care type services to consumers, but it could be read as having a broader definition. If a broader definition is applied, then some aspects of the guidance would potentially not be entirely relevant. This could also lead to an unintended consequence for some nurses who are in private work in the consultancy sector providing such services around management and perhaps education. It is noted that there are separate guidelines for NPs and PPM - is there an opportunity to cross reference these documents where relevant for greater consistency? Although unaware of dual qualified RN/RM in private practice, it might occur. Otherwise, the included elements seem to be appropriate and will potentially provide a better protection for the public.

Q40. Guidelines for privately practising nurses

Q38. 3. Would the proposed guidelines result in any potential negative or unintended effects for people requiring healthcare, including vulnerable members of the community who may choose to access PPN services?

☐ Yes

☒ No

Q39. Please explain why

This question was not displayed to the respondent.

Q41. Guidelines for privately practising nurses

Q42. 4. Would the proposed guidelines result in any potential negative or unintended effects for Aboriginal and/or Torres Strait Islander Peoples?

☐ Yes

☒ No

Q43. Please explain why

This question was not displayed to the respondent.

Q44. **Guidelines for privately practising nurses**

Q45. 5. Would the proposed guidelines result in any potential negative or unintended effects for PPNs?

☐ Yes

☒ No

Q46. Please explain why

This question was not displayed to the respondent.

Q48. **Guidelines for privately practising nurses**

Q55. 6. Are there any other potential regulatory impacts that the NMBA should consider? (refer to the NMBA statement of assessment at Appendix B)

☐ Yes

☒ No

Q56. Please explain why

This question was not displayed to the respondent.

Q54. **Guidelines for privately practising nurses**

Q47. 7. Do you have any other feedback on the proposed guidelines?

☐ Yes

☒ No

Q52. Please provide details

This question was not displayed to the respondent.

Q53. Thank you for your submission to the Nursing and Midwifery Board of Australia (NMBA) regarding the proposed **Guidelines for nurse practitioners privately practising nurses**. The NMBA will review and consider all feedback received before finalising the guidelines. (upon completion of the survey there is an option to save a copy of your responses for your records)

Should you have any questions please contact nmbafeedback@ahpra.gov.au. Once again we thank you for taking time to provide feedback.